

GRACE

**Environment, Health & Safety
GRACE Performance Chemicals**

W.R. Grace & Co.-Conn.
62 Whittemore Avenue
Cambridge, MA 02140-1692

(617) 876-1400
<http://www.gcp-grace.com>

August 13, 2003

USEPA Headquarters
Ariel Rios Building
12000 Pennsylvania Avenue
Washington, DC 20460

Re: HPV Orphans

Dear Sir or Madam:

This letter is in response to the list of HPV Orphan Chemicals that currently exists on the EPA web site (EPA's status report on sponsored HPV chemicals).

The attached letter was sent to Christine Whitman on September 6th, 2002 and requested that the Orphan Chemical Formic Acid Compound with 2;2', 2"-nitrilotris (ethanol), CAS# 24794-58-9 be designated a material "no longer HPV". Recent review of EPA's status report on sponsored HPV chemicals has identified this chemical is still being designated an Orphan. I wanted to bring this to the attention of individuals at USEPA Headquarters.

If you have any questions concerning this HPV chemical designation, or if information can be n provide to justify the Orphan status I can be reached at the phone number or internet address below.

Sincerely,

John J. Henningson
Product Steward (Americas)
W.R. Grace & Co.
EHS Department
617-498-4560 (phone)
617-498-4947 (Fax)
john.j.henningson@grace.com



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**Environment, Health & Safety
GRACE Construction Products**

W.R. Grace & Co.-Conn.
62 Whittemore Avenue
Cambridge, MA 02140-1692

(617) 876-1400
<http://www.gcp-grace.com>

September 6, 2002

Christine T. Whitman
1101A
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

W.R. Grace is requesting that the HPV Orphan Chemical Formic Acid Compound with 2,2,' 2"
- nitrilotris (ethanol) CAS# 24794-58-9 be designated a material "no longer HPV." This will
reduce the number of un-sponsored HPV Challenge Chemicals.

W.R. Grace has re-formulated products and eliminated production of significant quantities of
this chemical.

Consequently, W.R. Grace will report this chemical in 2002 IUR reporting. We do not expect to
report production of this chemical in future reports.

If you have any questions concerning this HPV Orphan Chemical, I can be reached at the
phone number, or e-mail address below.

John J. Henningson
Product Stewardship (Americas)
W.R. Grace & Co.
EHS Department
617-498-4560 (Phone)
617-498-4947 (Fax)
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